



Commonwealth of Massachusetts
**DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT**

Deval L. Patrick, Governor ♦ Timothy P. Murray, Lt. Governor ♦ Tina Brooks, Undersecretary

COMMUNITY SERVICES BLOCK GRANT (CSBG)

AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 (Recovery Act)

STATE PLAN

FEDERAL FISCAL YEARS

2009 - 2010

ADMINISTERED BY

COMMUNITY SERVICES UNIT

DIVISION OF COMMUNITY SERVICES

FUNDED BY

THE U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES

OFFICE OF COMMUNITY SERVICES

MAY 2009

TABLE OF CONTENTS

I. Federal Fiscal Years covered by this State CSBG Recovery Act Plan

II. Letter of Transmittal

III. Executive Summary

- A. CSBG State Legislation
- B. Designation of Lead State Agency
- C. Public Inspection of State CSBG Recovery Act Plan

IV. Statement of Federal and CSBG Recovery Act Assurances

V. The Narrative Plan

- A. Administrative Structure
 - (1) State Administrative Agency
 - (2) Eligible Entities
 - (3) Distribution and Allocation of Funds
- B. Description of Criteria and Distribution Formula
- C. Description of Distribution and Use of Restricted Funds
- D. State Community Services Program Implementation
 - (1) Program Overview
 - (a) Service Delivery System of Benefit Enrollment Coordination Activities
 - (b) Description of Recovery Act Projects
 - (c) The Service Delivery System for Recovery Act Projects
 - (d) Linkages
 - (e) Coordination with Other Public and Private Resources
 - (f) Innovative Community and Neighborhood-based Initiatives
 - (2) Community Needs Assessment
- E. Fiscal Controls and Monitoring
 - (1) State Program Monitoring
 - (2) Corrective Action, Termination and Reduction of Funding
 - (3) Tracking
- F. Reporting and Registration Requirements

VI. Appendices

I. Federal Fiscal Years covered by this State CSBG Recovery Act Plan

The Commonwealth's FY 2009–2010 Community Services Block Grant (CSBG) Recovery Act Plan describes how the CSBG program as appropriated under the American Recovery and Reinvestment Act (Recovery Act) of 2009 shall be administered within Massachusetts. The Plan sets forth how the state collects and analyzes client information, outcomes, and assists in determining local service delivery, program needs, and priorities. Furthermore, the Plan delineates the basis for funding as outlined in the following language related to CSBG Recovery Act:

"\$1,000,000,000 for carrying out activities under sections 674 through 679 of the Community Services Block Grant Act, of which no part shall be subject to section 674(b)(3) of such Act: *Provided*, That notwithstanding section 675C(a)(1) and 675C(b) of such Act, 1 percent of the funds made available to each State from this additional amount shall be used for benefits enrollment coordination activities relating to the identification and enrollment of eligible individuals and families in Federal, State, and local benefit programs: *Provided further*, That all funds remaining available to a State from this additional amount after application of the previous proviso shall be distributed to eligible entities as defined in section 673(1) of such Act: *Provided further*, That for services furnished under such Act during fiscal years 2009 and 2010, States may apply the last sentence of section 673(2) of such Act by substituting "200 percent" for "125 percent".

Activities shall be carried out in conformance with all applicable federal and state laws, as they may be issued, amended, or superseded from time to time, including, but not limited to, the CSBG Act (42 U.S.C. 9901 et seq.), CSBG Recovery Act, regulations promulgated by the U.S. Department of Health and Human Services (HHS) and the Department of Housing and Community Development's CSBG regulations (760 CMR, 29.00). In case of any conflict between the regulations of the Department of Housing and Community Development (DHCD) and any provision of the CSBG Act, CSBG Recovery Act, or applicable federal regulations, the federal provision shall prevail.

II. Letter of Transmittal

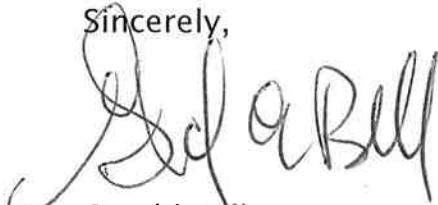
Ms. Yolanda J. Butler, Ph.D.
Acting Director
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services
Attention: Community Services Block Grant Program
370 L'Enfant Promenade, S. W., 5th Floor West
Washington, D.C. 20447

Dear Ms. Butler:

Enclosed are the original and one copy of the Commonwealth of Massachusetts' Community Services Block Grant (CSBG) American Recovery and Reinvestment Act (Recovery Act) Plan describing how the Department of Housing and Community Development will administer the CSBG Recovery Act program in Fiscal Years 2009 and 2010.

We look forward to working with your office in the coming fiscal years. If additional information is desired, please do not hesitate to contact me at (617) 573-1438.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerald Bell", written in a cursive style.

Gerald Bell

Manager

Community Services Programs

The State office to receive the CSBG award notices is:

Massachusetts Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114
Office: (617) 573-1100
Fax: (617) 573-1460
Attention: Francena Brooks, Undersecretary
E-mail: Tina.Brooks@state.ma.us

The contact person for CSBG program issues is:

Gerald Bell
Manager, Community Services Programs
Division of Community Services
Massachusetts Department of Housing and Community Development
100 Cambridge Street, Suite 300
Boston, MA 02114
Office: (617) 573-1438
Fax: (617) 573-1460
E-mail: Gerald.Bell@state.ma.us

Employer Identification Number: 1-046002284-L3

III. EXECUTIVE SUMMARY

A. CSBG State Legislation

Authorizing State Statute

The Massachusetts Economic Opportunity Act of 1984, as amended, M.G.L. c. 23B section 24.

Prior to the enactment of Chapter 204 of the Acts of 1996, the Department of Housing and Community Development (DHCD) was known as the Executive Office of Communities and Development. Section 16 of Chapter 19 of the Acts of 2007 changed Director of DHCD to Undersecretary of DHCD.

The Massachusetts State Legislature enacted “The Economic Opportunity Act” for low-income citizens of the Commonwealth of Massachusetts.

Consistent with the Community Services Block Grant Act, [Public Law 97-35, Section 672 et seq. as amended 42 USC. Sec. 9901 et seq.], the Commonwealth of Massachusetts Economic Opportunity Act provides:

- A. A definition of terms used for programs operated by the Commonwealth of Massachusetts, e.g., Community Action Agency, Community Services Block Grant, Density of Poverty . . . ;
- B. A description of the requirements for a community action agency's Board of Directors and the qualifications that must be met in order for an organization to be recognized as a community action agency;
- C. A description of the contractual relationship between the state and community action agencies, including the Undersecretary of DHCD, authority to promulgate regulations governing the use of funds, community action agency performance criteria, the de-designation

procedure, and the process by which a community action agency may be designated to serve an unserved area;

- D. A description of how Community Services Block Grant funds will be distributed with ninety percent (90%) for community action agencies, five percent (5%) for discretionary Special Projects, and five percent (5%) for the Department's grant administration expenses; and
- E. A description of the Undersecretary's authority, subject to appropriation, to disburse additional funds, and for community action agencies to obtain funds other than those distributed by the Undersecretary of DHCD.

Paragraph D above does not apply to funds received under the CSBG Recovery Act allocation and this State Plan for FY 2009 – 2010.

B. Designation of Lead Agency to Administer the CSBG Recovery Act Program

In accordance with Section 676(a)(1) of the Community Services Block Grant Act, as amended (P.L. 105-285), the Governor of the Commonwealth of Massachusetts has designated the Department of Housing and Community Development as the lead administering agency of the Community Services Block Grant (CSBG) Recovery Act program. Francena Brooks, as the Undersecretary of DHCD, is authorized to sign federal assurances and all other documents pertaining to the CSBG Recovery Act program.

Letter of Designation

See attached.



OFFICE OF THE GOVERNOR
COMMONWEALTH OF MASSACHUSETTS
STATE HOUSE • BOSTON, MA 02133
(617) 725-4000

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

May 18, 2009

Ms. Yolanda J. Butler, Ph.D.
Acting Director
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services
370 L'Enfant Promenade, S.W., 5th Floor West
Washington, D.C. 20447

Dear Ms. Butler:

In accordance with Section 9908(a)(1) of the Community Services Block Grant Act as most recently amended (42 U.S. C. Section 9901 et seq.), I hereby designate the Department of Housing and Community Development (DHCD) to act as the lead agency for the administration of the Community Services Block Grant. Francena Brooks, Undersecretary of DHCD, is authorized to sign federal assurances and all other documents pertaining to the Community Services Block Grant, as authorized under the American Recovery and Reinvestment Act of 2009.

Sincerely,

A handwritten signature in black ink, appearing to read "Deval Patrick", written over a large, loopy flourish.

C. Public Inspection of State CSBG Recovery Act Plan

1. Public Information Session [42 USC 9908 (a) (2) (B)]

The Department encourages public participation in the development of services and activities covered by this Plan, including the opportunity to review, and/or submit written comments. A public information session was held at DHCD on May 14, 2009. Written comments received until May 25, 2009 were considered in the development of the final CSBG Recovery Act State Plan.

2. Public Inspection of State CSBG Recovery Act Plan [42 USC 9908 (e)(2)]

DHCD provided written notification (see appendices) to CAAs and other appropriate entities announcing the availability of the proposed FY 2009–2010 CSBG Recovery Act Plan for public inspection. The draft plan was available for public inspection in May 2009. In order to facilitate this requirement, the proposed plan was available on the DHCD website located at: www.mass.gov/dhcd.

IV. STATEMENT OF FEDERAL AND CSBG RECOVERY ACT ASSURANCES

As part of the plan required by Section 676 of the Community Services Block Grant Act as amended, 42 U.S.C. 9901 et seq. (The Act)., DHCD acting as the lead agency for the administration of the CSBG, hereby agrees to all applicable Assurances in Section 676 of The Act, unless otherwise stated in the American Recovery and Reinvestment Act ("Recovery Act") of 2009.

A. Programmatic Assurances

- (1) Funds made available through this grant or allotment will be used:
 - (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farmworkers, and elderly low-income individuals and families to enable the families and individuals to:
 - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);
 - (ii) secure and retain meaningful employment;
 - (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
 - (iv) make better use of available income;

- (v) obtain and maintain adequate housing and a suitable living environment;
 - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
- (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after school child care programs; and

- (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b)(1)]

The term “low-income” shall be defined as families or households with an annual income of not more than 200% of federal poverty guidelines as issued by the Secretary of the U.S. Department of Health and Human Services.

- (2) To provide information provided by eligible entities in the State, including:
 - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of The Act, targeted to low-income individuals and families in communities within the State;
 - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
 - (c) a description of how funds made available through grants made under Section 675C(a) will be coordinated with other public and private resources; and
 - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b)(3)]
- (3) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals. [676(b)(4)]

- (4) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998. [676(b)(5)]
- (5) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under title XXVI (relating to home energy assistance) are conducted in such communities. [676(b)(6)]
- (6) To permit and cooperate with Federal investigations undertaken in accordance with Section 678D of the Act. [676(b)(7)]
- (7) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act. [676(b)(8)]
- (8) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. [676(b)(9)]

- (9) To require each eligible entity in the State to establish procedures under which a low-income individual, community organizations, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. [’676(b)(10)]
- (10) To secure from each eligible entity in the State, as a condition to receipt of funding, a community action plan (which shall be submitted to the Secretary, at the request of the Secretary, with the State plan) that includes a community-needs assessment for the community served, which may be coordinated with community-needs assessments conducted for other programs. [676(b)(11)]
- (11) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act. [676(b)(12)]
- (12) To provide information describing how the State will carry out these assurances. [’676(b)(13)] Please see the Recovery Act CSBG State Plan below.

B. Administrative Assurances

The State further agrees to the following (where applicable), as required under The Recovery Act:

- (1) To submit a plan to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in the Recovery Act.

- (2) To distribute not less than 99 percent of the Recovery Act allocations made available to the State by the Secretary to make grants to "eligible entities" as defined by Section 673(1) of the CSBG Act for the stated purpose of the Recovery Act.
- (3) To make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding carryover of unobligated funds as stated in the Appropriation Act. (H.R. 3061).
- (4) To spend no more than 1 percent of the State allotment received under the Recovery Act for benefits enrollment coordination activities relating to the identification and enrollment of eligible individuals and families in Federal, State, and local benefit programs.
- (5) To fulfill supplemental reporting requirements for CSBG Recovery Act funds.
- (6) To provide information describing how the State will carry out activities and services supported by Recovery Act funds, as outlined in this Plan.

Signature: Francena Brooks Date: 5/18/09
Francena Brooks, Undersecretary
Department of Housing and Community Development

V. THE NARRATIVE STATE PLAN

(A) Administrative Structure

(1) State Administrative Agency

The Executive Office of Housing and Economic Development's Department of Housing and Community Development (DHCD) is the Commonwealth's principal agency for public housing and community development concerns that affect the state's 351 cities and towns. In this role, DHCD utilizes state and federal funds and technical assistance available to strengthen communities and help them plan new developments, encourage economic development, revitalize areas of disinvestment, improve local government management, build and manage public housing, stimulate affordable rental and homeownership through the public/private sector, and respond to the needs of low-income people. DHCD administers the state's public housing programs, coordinates its anti-poverty efforts, allocates federal community development resources, and provides a variety of services to local government officials.

Mission, Goals and Objectives

The mission of DHCD is to strengthen cities, towns, and neighborhoods to enhance the quality of life of Massachusetts' residents. To accomplish this mission, DHCD will provide leadership, professional assistance, and financial resources to promote safe, decent affordable housing opportunities, economic vitality of communities and sound municipal management. DHCD will forge partnerships with regional and local governments, public agencies, community-based organizations, and the business community to achieve common goals and objectives. In all of these efforts, DHCD will recognize and respect the diverse needs, circumstances, and characteristics of individuals and communities.

The Department of Housing and Community Development is committed to:

1. programs and funding that target populations of low- to moderate-incomes and those with special needs;
2. coordinated, integrated and balanced agency responses to address the comprehensive needs and interests of communities;
3. programs and technical assistance designed to facilitate informed decision making at the local level, and to encourage self-sufficiency of residents and communities; and
4. sound business practices that ensure the highest standards of public accountability and responsibility.

The Office of the Undersecretary

The Undersecretary is appointed by the Governor to administer and maintain executive authority over all phases of DHCD's activities and to coordinate policy with the Governor and the rest of the Administration. The Undersecretary is a member of the Board of Directors (Vice Chairman) of MassHousing (formerly the Massachusetts Housing Finance Agency), the Massachusetts Housing Partnership Fund, and the Community Development Finance Corporation. The Undersecretary is also a member of the Local Government Advisory Council, and is co-chair of the Commonwealth's Economic Assistance Coordinating Council, and the Commission to End Homelessness, and the Asset Development Commission. The Undersecretary also serves on numerous other state boards and commissions.

The Office of the Undersecretary includes the Office of the Chief of Staff and the Communications Office. The Undersecretary is also assisted by the Office of the Chief Counsel, Office of Policy Development and the Office of Administration and Finance.

DHCD is responsible for a variety of programs and services that are

administered through three (3) divisions (Division of Community Services, Division of Public Housing and Rental Assistance, and Division of Housing Development). A new division has been created by merging the Department of Transitional Assistance's emergency shelter services with DHCD housing programs. DHCD also includes the Commission on Indian Affairs, the Manufactured Homes Commission, and the American and Canadian/French Cultural Exchange Commission. In addition, the following quasi-public agencies are affiliates of DHCD: MassHousing; the Community Development Finance Corporation; the Massachusetts Community Economic Development Assistance Corporation, and the Massachusetts Housing Partnership.

Division of Community Services

This Division is the conduit through which DHCD serves Massachusetts' low-income population. Working in cooperation with the federal government, other state agencies, local and regional nonprofits, and the private sector, the Division is responsible for planning, implementing, and monitoring the delivery of federal and state anti-poverty, neighborhood economic development, homelessness prevention, fuel assistance, and weatherization programs across the Commonwealth. The Division of Community Services (DCS) is organized into six (6) components: the Community Services Unit (CSU), the Community Development Unit (CDU), the Community Assistance Unit (CAU), the Energy Conservation Unit (ECU), the Policy and Planning Unit (PPU) and the Fiscal and Compliance Unit (FCU).

The Community Services Unit administers the Community Services Block Grant, the Low-income Home Energy Assistance Program (LIHEAP), Individual Development Accounts (IDA), and the Neighborhood Housing Services (NHS) program.

The Community Development Unit is responsible for allocating financial and technical resources to assist cities and towns with their revitalization and community development needs. The Unit uses resources such as Community Development Block Grants, Community Development Action Grant's Mass

Downtown Initiative, and other state and federal grants, as well as the technical expertise of staff, to support a wide variety of community, housing, and economic development efforts.

The Community Assistance Unit is comprised of a number of programs including Urban Renewal, Urban Center Housing – Tax Increment Financing (UCH-TIF), Smart Growth, 40R, and Relocation. The Community Assistance Unit (CAU) is DHCD's conduit for linking communities with planning and development resources, facilitating its mission to strengthen cities and towns by providing technical assistance and training, and supporting local community development and capacity building activities. The CAU's interdisciplinary staff works across programs to enhance service delivery with a focus on housing production, land use and zoning, economic development, sustainable development, and municipal governance in order to help communities effect change and better manage development.

The Energy Conservation Unit (ECU) works closely with the Community Services Unit (CSU) and administers the Heating Energy Assistance Retrofit Task Weatherization Assistance Program (HEARTWAP) and the Weatherization Assistance Program (WAP). HEARTWAP and WAP are funded by HHS and the U.S. Department of Energy (DOE) respectively.

Where possible, DCS attempts to integrate the resources of the Community Development Unit, Community Services Unit, Community Assistance Unit and the Energy Conservation Unit.

The Fiscal and Compliance Unit manages all financial, budgeting, contractual and accounting functions of the Division.

The Policy and Planning Unit administers the CSBG discretionary (Special Projects) program and provides policy comments and recommendations on proposed legislation and regulations, and analyzing each to ensure consistency among DCS' goals and DHCD's and the Governor's priorities.

Division of Public Housing and Rental Assistance

The Public Housing and Rental Assistance Division carries out its responsibility for oversight of all state-aided public housing and various rental subsidy programs by partnering with 242 local housing authorities and 8 regional nonprofit agencies. Through this network, the division maintains a portfolio of over 50,000 units of state-assisted public housing, nearly 19,000 federal rental vouchers and over 7,000 state rental vouchers. These resources provide decent, safe and sanitary affordable homes for over 2% of Massachusetts Residents - low- and moderate-income families, senior citizens and persons with disabilities. While many of these programs may serve households with incomes up to 80% of the area median, this housing generally performs as the safety net for very low-income elderly and family household.

The Division works through three (3) bureaus:

Housing Management, that works with local housing authorities on their day-to-day operations and budgets, and also performs research and advocacy about the needs for sufficient resources and professional management;

Housing Development and Construction, that provides technical assistance and project administration in the areas of design, development and construction with the goal of modernizing the entire portfolio and constructing specialized new public housing units where appropriate;

Rental Assistance, that carries out the division's role as Massachusetts' largest administrator of the Section 8 rental voucher program and the MRVP and AHVP programs, overseeing rental subsidies, upgrading of substandard rental housing and a wide spectrum of support services tied to a rental subsidy.

Division of Housing Development

This Division supports the production of affordable rental housing, including units for persons with special needs, and the construction or rehabilitation of affordable homes and condominiums for purchase by income-eligible first-time homebuyers. Among the programs that are administered by Housing Development are the Federal Home and Tax Credit programs, Housing Stabilization Fund, HOME, Housing Innovation Fund, Capital Improvement and Preservation Fund, Facilities Consolidation Fund and the Soft Second Program.

2. Eligible Entities

The following chart lists the eligible entities, CSBG Recovery Act allocations, and geographic areas served (also see Table 4, and Appendices for additional information on geographic areas served).

Table 1: Eligible Entities – Proposed CSBG Recovery Act Allocation and Selected CAA Data

CAA	Location (MA City/Town)	CSBG Recovery Act Allocation	Total CAA Non-CSBG Budget*	Number of Individuals Served*
ABCD	Boston	\$ 9,560,926	\$127,217,286	88,509
ACTION	Gloucester	\$ 458,924	\$ 17,769,565	5,649
BCAC	Pittsfield	\$ 629,171	\$ 8,099,089	15,089
CEOC	Cambridge	\$ 698,255	\$ 1,081,492	19,714
CFC	Fall River	\$ 875,904	\$ 26,841,785	31,900
CAAS	Somerville	\$ 587,227	\$ 4,488,327	1,868
CACCI	Barnstable	\$ 572,421	\$ 9,820,030	13,844
CAI	Haverhill	\$ 476,196	\$ 12,869,128	13,605
CAI	Greenfield	\$ 1,026,412	\$ 14,277,693	27,071
CAPIC	Chelsea	\$ 503,337	\$ 10,952,143	10,296
CTI	Lowell	\$ 824,091	\$ 63,840,759	34,251
GLCAC	Lawrence	\$ 555,150	\$ 25,236,593	19,575
LEO	Lynn	\$ 715,530	\$ 8,911,227	11,073
MOC	Fitchburg	\$ 634,105	\$ 16,724,045	22,352
NSCAP	Peabody	\$ 545,280	\$ 7,341,288	13,390
PACE	New Bedford	\$ 774,745	\$ 44,273,294	34,690
QCAP	Quincy	\$ 453,990	\$ 23,225,585	21,402
SHI	Avon	\$ 737,733	\$ 23,763,856	26,133
SMOC	Framingham	\$ 500,870	\$ 61,452,442	40,510
SSCAC	Plymouth	\$ 453,990	\$ 14,409,644	19,734
SPCA	Springfield	\$ 838,894	\$ 2,616,969	5,967
TRI-CAP	Malden	\$ 668,647	\$ 8,720,499	13,182
VOC	Holyoke	\$ 562,553	\$ 27,076,706	37,500
WCAC	Worcester	\$ 1,019,009	\$ 16,428,237	25,005
TOTAL		\$ 24,673,360	\$577,437,682	552,309

* As reported in the FY 2008 CSBG Information System (IS) Survey, after state adjustments.

3. Distribution and Allocation of Funds

(A) Planned Distribution of CSBG Recovery Act Funds for Fiscal Years 2009 – 2010

Table 2: Eligible Entities and Proportionate Share of CSBG Recovery Act Funds

<u>Eligible Entities</u>	<u>Proportional Share</u>
1. Action for Boston Community Development, Inc. (Boston)	38.75%
2. Action, Inc. (Gloucester)	1.86%
3. Berkshire Community Action Council, Inc. (Pittsfield)	2.55%
4. Cambridge Economic Opportunity Committee, Inc. (Cambridge)	2.83%
5. Citizens for Citizens, Inc. (Fall River)	3.55%
6. Community Action Agency of Somerville, Inc. (Somerville)	2.38%
7. Community Action Committee of Cape Cod & Islands, Inc. (Barnstable)	2.32%
8. Community Action, Inc. (Haverhill)	1.93%
9. Community Action of the Franklin, Hampshire and North Quabbin Regions, Inc. (Greenfield)	4.16%
10. Community Action Programs Inter-City, Inc. (Chelsea)	2.04%
11. Community Teamwork, Inc. (Lowell)	3.34%
12. Greater Lawrence Community Action Council, Inc. (Lawrence)	2.25%
13. Lynn Economic Opportunity, Inc. (Lynn)	2.90%
14. Montachusett Opportunity Council, Inc. (Fitchburg)	2.57%
15. North Shore Community Action Programs, Inc. (Peabody)	2.21%
16. People Acting in Community Endeavors, Inc. (New Bedford)	3.14%
17. Quincy Community Action Programs, Inc. (Quincy)	1.84%
18. Self-Help, Inc. (Avon)	2.99%
19. South Middlesex Opportunity Council, Inc. (Framingham)	2.03%
20. South Shore Community Action Council, Inc. (Plymouth)	1.84%
21. Springfield Partners for Community Action, Inc. (Springfield)	3.40%
22. Tri-City Community Action Program, Inc. (Malden)	2.71%
23. Valley Opportunity Council, Inc. (Holyoke)	2.28%
24. Worcester Community Action Council, Inc. (Worcester)	4.13%

(B) Description of Criteria and Distribution Formula

As outlined in Table 1, DHCD shall award 99% of the CSBG Recovery Act funds allocated to the Commonwealth of Massachusetts to the 24 private, nonprofit eligible entities. The Commonwealth of Massachusetts has received \$24,922,586, in Community Services Block Grant Recovery Act funding from HHS for FY 2009 – 2010, of which 99%, or \$24,673,360 will be awarded to eligible entities as grants based on a historical funding formula currently in place (Table 2) and in any other manner which is consistent with the requirements of the CSBG Recovery Act.

The annual funding and contracting cycle shall correspond directly to the timely availability of funds from HHS.

Community Services Block Grant Recovery Act funds that are distributed as grants to eligible entities in Fiscal Year 2009 and have not been expended by an entity may be carried over into Fiscal Year 2010 for expenditure by the entity for program purposes. DHCD shall track CSBG carry-over funds (if any) through the following three mechanisms:

1. During Fiscal Year 2010, CSBG Recovery Act application process, carryover funds from Fiscal Year 2009 shall be identified in the CSBG budget.
2. Carryover funds shall be reprogrammed into Fiscal Year 2010 CSBG budget.
3. Carryover funds shall be tracked separately by the agencies final fiscal report and through audit reports.

No funds shall be carried over by a CAA beyond Fiscal Year 2010, unless otherwise approved by DHCD in writing.

(C) Description of Distribution and Use of Restricted Funds.

Benefit Enrollment and Coordination:

DHCD shall reserve 1% or \$249,226 of its CSBG Recovery Act allocation for benefits enrollment coordination activities relating to the identification and enrollment of eligible individuals and families in Federal, State, and local benefit programs. Pending approval from HHS, DHCD shall develop in conjunction with all 24 eligible entities, a detailed benefit enrollment plan. This plan shall include details about how each eligible entity will identify and enroll income eligible individuals and families into CSBG Recovery Act-funded programs including homeless and at-risk households with incomes between 125% and 200% of federal poverty guidelines, as issued by the Secretary of HHS in January 23, 2009 (Federal Register, Vol. 74, No 14, January 23, 2009, pp. 4199–4201). The plan shall include the following components:

Linkages of DHCD and other Service Providers

A linkage between DHCD, the Massachusetts Department of Transitional Assistance (and other Executive Office of Health and Human Services agencies), the Interagency Commission on Housing and Homelessness and other eligible populations shall be developed. This shall require an enhanced coordination of services and tracking of clients among the eligible entities and the Massachusetts workforce development network, health centers, public schools, regional homelessness prevention network, and the Massachusetts emergency shelter system.

Coordination of Internal and External Referral with the Massachusetts Energy Assistance Programs.

In Massachusetts, the LIHEAP is administered at the local level primarily by CSBG eligible entities (22 out of 24 CSBG eligible entities are also the recipients of LIHEAP and other energy assistance funds). The benefit enrollment plan shall

include a process to identify LIHEAP recipient households who are in need of employment, housing, nutrition, and health related assistance. CSBG eligible entities shall assist potential benefit recipient households to enroll into state and federal benefit programs. This includes, Supplemental Nutritional Assistance Program (SNAP) or Food Stamps, health insurance coverage programs, such as Commonwealth Care or MassHealth, Social Security Insurance (SSI), unemployment benefits, Women, Infant, and Children (WIC), subsidized housing, foreclosure prevention, and homelessness prevention programs. This segment of the plan shall be supported by Massachusetts LIHEAP administrative funds.

This new internal referral mechanism will require better coordination at the local level between CSBG and LIHEAP-funded staff. Furthermore, enhanced information and referral networking shall be required between client tracking processes currently in place at each eligible entity.

The Recovery Act requires transparency of and accountability measures for the use of federal funds. In order to fulfill new planning, benefit enrollment, and client tracking requirements, CAAs shall identify potential income eligible populations and guide them through the process of intake assessment, internal and external referrals, and outcome tracking across the CSBG service delivery network.

D. State Community Services Program Implementation

Program Overview

(a) The Service Delivery System of Benefit Enrollment Coordination Activities

Due to a highly decentralized nature of the CSBG Recovery Act projects, DHCD intends to utilize a two-prong service delivery system for benefit enrollment coordination involving various program units within DHCD and the CAA network. DHCD shall utilize its 1% benefit enrollment funds to support a DHCD-wide initiative linking its housing and homeless prevention, anti-poverty, low-income

home energy, and State and Federal benefit enrollment service delivery systems. It will rely on service providers that are moving clients from homelessness to stable and permanent housing, CAAs that are assisting low-income applicants receive fuel and other energy assistance services, enroll into other state and federally-funded programs, such as Supplemental Nutritional Assistance or Food Stamp, health insurance, Social Security, unemployment benefit, and various types of sufficiency programs.

At the CAA level, agencies will be encouraged to utilize a portion of their CSBG Recovery Act funds for benefit coordination. Subject to HHS approval, each CAA with guidance from DHCD, shall develop an internal and external referral process using their client tracking software to identify potential CSBG-eligible clients who were previously not offered assistance due to income restrictions, yet may be eligible now due to the increased income eligibility threshold. Furthermore, this type of coordination will require the development of a uniform safety net at the CAA level for potential clients who are currently experiencing difficulty due to the on-going recession.

(b) Description of Recovery Act Projects.

In anticipation of receiving the Community Services Block Grant (CSBG) Recovery Act award from HHS, in March 2009, DHCD completed a preliminary analysis of proposed CSBG Recovery Act-funded projects. Given the urgency reflected in the Recovery Act and anticipated increases in CSBG funding and the income eligibility threshold from 125% to 200% of federal poverty level, eligible entities were required to provide DHCD with a brief outline of proposed project concepts and the applicable usage of CSBG Recovery Act funds. During the remainder of Fiscal Year 2009 and during Fiscal Year 2010, DHCD shall guide all 24 eligible entities to expand their existing programs and develop new programs and strategies supporting employment, nutrition, housing, including homelessness prevention, asset development and healthcare efforts for income-eligible Massachusetts residents. DHCD encourages certain activities consistent with the CSBG Recovery Act such as homelessness prevention.

As outlined elsewhere in this Plan, DHCD shall increase its CSBG income eligibility threshold from 125% to 200% of the federal poverty level to serve individuals and households that were not previously eligible to receive CSBG-funded services.

Based on responses received from the eligible entities, DHCD has developed the following list indicating, (1) Service Category; (2) Proposed Project Concepts; and (3) the Estimated Percentage of CSBG Recovery Act funds to be used under each Service Category.

Table 3: CSBG Recovery Act Project Concepts for Fiscal Years 2009 – 2010

Service Category	Sample Proposed Project Concepts	Estimated Percentage of CSBG Recovery Act
Employment and Training	Job search, training and placement programs for unemployed, including an Economic Recovery Center. GED, Green Jobs, Energy Auditors training and Information Technology training.	41%
Housing & Homelessness Prevention	Coordination of services with the State Interagency Council on Housing & Homelessness (ICHH), housing search, placement of homeless clients, stabilization services including asset development through Individual Development Accounts, Volunteer Income Tax Assistance/Earned Income Tax Credit, financial literacy training, and foreclosure prevention services for homeowners and tenants living in foreclosed houses. Emergency shelters, rent and Utility payments.	35%
Nutrition	Food pantry, emergency food distribution, nutritional outreach and training, Food Stamp outreach and enrollment.	10%
Health	Health insurance outreach and enrollment, health care for teens and elders, home inspections, behavioral health services, community outreach, counseling and support.	10%
Education and Literacy	Early education support, after school programs, and day care support.	3%
Other		1%

During the remainder of the Fiscal Year 2009, DHCD shall assist all 24 eligible entities to incorporate the CSBG Recovery Act project concepts into detailed service delivery strategies and the Result Oriented Management and Accountability (ROMA) work plans. CSBG Recovery Act funds will be allocated based on each CAA's proportionate share as outlined in Section 2 (Eligible Entities) and Section 3 (Distribution and Allocation of Funds).

As a condition of funding, each eligible entity shall be required to submit an Application for CSBG Recovery Act funds that shall include:

- 1) A separate ROMA work plan for CSBG Recovery Act-funded activities; and
- 2) A separate CSBG Recovery-Act Budget.

(c) Service Delivery System for Recovery Act Projects

As part of a three-year Community Action Planning (CAP) process, each eligible entity in Massachusetts is mandated to develop a Community Action Plan or Strategic Plan including a description of its Service Delivery System. The most recent CAP, covering Fiscal Years 2009 – 2011 was submitted to DHCD in August 2008. During the Fiscal Years 2009 and 2010, each of the 24 CAAs or CSBG eligible entities shall develop a detailed CSBG Recovery Act Work Plan comprising at minimum the following areas: (1) Outcome-based Activities; (2) Service Delivery Methods; (3) Base Line Clients; (4) National Indicators of Community Action Agency Performance; (5) other indicators including a measurement assessment of stabilization services including long-term self-sufficiency. For the most part, CAAs offer services through a decentralized local service delivery network comprised of other nonprofit corporations, volunteer sites, state and local government offices, career centers, housing and homelessness prevention network, and delegate agencies. The following table shows each of the 24 CSBG eligible entities in Massachusetts and areas served.

Table 4: CSBG Eligible Entities and Designated Geographic Areas Served

CAA	Designated Geographic Areas Served
ABCD	Boston
ACTION	Essex, Gloucester, Ipswich, Manchester-by-the-Sea, and Rockport.
BCAC	Adams, Alford, Becket, Cheshire, Clarksburg, Dalton, Egremont, Florida, Great Barrington, Hancock, Hinsdale, Lanesborough, Lee, Lenox, Monterey, Mount Washington, New Ashford, New Marlborough, North Adams, Otis, Peru, Pittsfield, Richmond, Sandisfield, Savoy, Sheffield, Stockbridge, Tyringham, Washington, West Stockbridge, Williamstown, and Windsor.
CEOC	Cambridge
CFC	Fall River, Freetown, Somerset, Swansea, Taunton, and Westport.
CAAS	Somerville
CACCI	Barnstable, Bourne, Brewster, Chatham, Chilmark, Dennis, Eastham, Edgartown, Falmouth, Gay Head, Gosnold, Harwich, Mashpee, Nantucket, Oak Bluffs, Orleans, Provincetown, Sandwich, Tisbury, Truro, Wareham, Wellfleet, West Tisbury, and Yarmouth.
CAI	Amesbury, Groveland, Haverhill, Merrimac, and Newburyport.
CA!	Amherst, Ashfield, Belchertown, Bernardston, Buckland, Charlemont, Chesterfield, Colrain, Conway, Cummington, Deerfield, Easthampton, Erving, Gill, Goshen, Granby, Greenfield, Hadley, Hatfield, Hawley, Heath, Huntington, Leverett, Leyden, Middlefield, Monroe, Montague, New Salem, Northfield, Northampton, Orange, Pelham, Plainfield, Rowe, Shelburne, Shutesbury, South Hadley, Southampton, Sunderland, Ware, Warwick, Wendell, Westhampton, Whately, Williamsburg, and Worthington.
CAPIC	Chelsea, Revere, and Winthrop.
CTI	Billerica, Chelmsford, Dracut, Dunstable, Lowell, Tewksbury, Tyngsborough, and Westford.
GLCAC	Andover, Lawrence, Methuen, and North Andover.
LEO	Lynn
MOC	Ashburnham, Athol, Berlin, Bolton, Clinton, Fitchburg, Gardner, Lancaster, Leominster, Phillipston, Royalston, Sterling, Templeton, West Minister, and Winchendon.
NSCAP	Beverly, Danvers, Peabody, and Salem.
PACE	New Bedford
QCAP	Quincy

SHI	Abington, Attleboro, Avon, Bridgewater, Brockton, Canton, East Bridgewater, Easton, Hanson, Holbrook, Mansfield, North Attleboro, Norton, Plainville, Randolph, Rockland, Sharon, Stoughton, West Bridgewater, and Whitman.
SMOC	Ashland, Bellingham, Framingham, Holliston, Hopkinton, Marlborough, Natick, Southborough, and Wayland.
SSCAC	Carver, Duxbury, Hanover, Hull, Kingston, Marshfield, Norwell, Pembroke, Plymouth, Plympton, and Scituate.
SPCA	Springfield
TRI-CAP	Everett, Malden, and Medford.
VOC	Chicopee and Holyoke.
WCAC	Worcester

Comments received from CAAs or other interested parties between now and the Public Inspection period shall be incorporated into the final CSBG Recovery Act Plan.

(d) Linkages

As part of DHCD's CSBG Recovery Act Work Plan development process, each eligible entity shall be required to include a description of how new linkages will be developed to fill gaps in service identified during their Fiscal Year 2009 Community Action Planning and CSBG Recovery Act proposed project concept development process. Furthermore, the description shall include a methodology for information dissemination, referral to other services providers, and case management follow-ups.

(e) Coordination with Other Public and Private Resources

The description shall also include a ratio between CSBG Recovery Act funds and funds received from other public and private sources. All leveraged non-CSBG funds shall be identified in their CSBG Recovery Act budget to avoid duplication and/supplanting.

(f) Innovative Community and Neighborhood-based Initiatives

DHCD, during its CSBG Recovery Act Work Plan development process, shall introduce an “innovation factor” model that will delineate all community-based projects into two broad categories:

- (1) Expansion of Existing Projects, and
- (2) New Innovative Projects.

Subject to a 15% limitation on the use of CSBG funds for administrative purposes, projects that meet these above mentioned innovation criteria shall be evaluated using the following two National Goals of Community Action Agency Performance:

- National Goal 2 – The Conditions in Which Low-Income People Live are Improved.
- National Goal 3 – Low-Income People Own a Stake in Their Community.

(2) Community Needs Assessments

During the three-year Community Action Planning process, each eligible entity was required to develop a description of all methods used (e.g., surveys performed, interviews, focus groups, etc.), including a review of secondary data sources. In addition, a description of all needs assessment results, methods of tabulation, and how priority items were identified and were included in the Community Action Plan.

The goal for the initial phase of a needs assessment was to collect and analyze data that describes each eligible entity’s community/service area, the population demographics, and the relevant economic and social conditions. Subsequent analysis of the data produced a set of problem statements for the purpose of addressing those in the future.

During the preliminary phases of the needs assessment process, each CAA attempted to address the following:

1. What are the key questions to be answered?
2. Who are the constituencies, neighborhoods or target population(s) that need to be engaged?
3. How many people should be included?

The answers to these questions served as the framework for needs assessment development.

By using this information, the major issues, problems, and needs within their service area were addressed by CAAs. In order for the needs assessment to provide an accurate picture of the service area's needs, DHCD encouraged random sampling (to the extent possible) of all community residents.

All 24 three-year Community Action Plans were submitted to DHCD between August and September 2008. These plans included the following sections:

- Mission Statement: a brief statement of the CAA's mission (based on the CSBG statute);
- Community Profile: a description of the CAA's service area and target populations. The profile should be based on the community needs assessment and internal needs assessment results;
- Community Needs Assessment: a description of all methods used (e.g., surveys performed, interviews, focus groups, etc.), including secondary data sources, to determine community priority issues. In addition, a description of all needs assessment results, methods of tabulation, and how priority items were identified should be included in the Community Action Plan;
- Internal Needs Assessment: a description of the method used to identify agency staff and board of directors issues, a listing of results identified through the assessment process, and a description of how

issues will be addressed;

- Service Delivery System a description of the CAAs service delivery system (how and through what activities and programs are services delivered to low-income individuals and families in the service area;
- Identification and Evaluation of National Indicators and CSBG National Goals and Outcome Measures: a description of the Outcome Measures (one for each goal) to be used to monitor success in promoting self-sufficiency, community involvement, and increasing and improving the capacity of CAAs. This section should also include a description of the goals and strategies that the CAA plans to adopt for the next three (3) years. Strategy development should include projected program outcomes, the desired impact of the programs and activities delivered, and, strategies for achieving the goals, etc.;
- Linkages: a description of how identified gaps in services will be filled, e.g., through information and referral services, case management, follow-up consultation, advocacy for other local service providers, etc.;
- Funding Strategy: a description of how funding under the CSBG Act will be coordinated with public and private resources and a description of fundraising goals and strategies for the next three (3) years; and
- Vision Statement: a description of anticipated organizational operations and services to clients for the next three (3) years.

In order to ensure that the Plan would meet statutory requirements, DHCD set benchmarks that included developing certain strategic goals during the planning process. The first components of the Plan, The Action Planning document and needs assessment rationales described the planning process to be used by CAAs and provided a description of all needs assessment methods and survey instrument(s) to be utilized during the community needs assessment process.

The DHCD evaluation process included a two-member review team. DHCD provided extensive technical assistance, both on-site and via the telephone, in the development stage of the plan. Due to the up to date nature of information collected during the CAP process, each eligible entity will be able to create a foundation of needs for CSBG Recovery Act projects. Furthermore, eligible entities shall be guided during the CSBG Recovery Act Work Plan development process to identify unmet needs that they were not able to meet due to funding or income restrictions. With the infusion of additional resources in the form of CSBG Recovery Act funds vis-à-vis an increase in the income eligibility thresholds, CAAs are now better equipped to create new activities for previously unserved and new households that are in need of stabilization services.

E. Fiscal Controls and Monitoring [42 USC 9914]

The Recovery Act funds are provided for purposes including: preserving and creating jobs and promoting economic recovery; assisting those most impacted by the recession; investing in transportation, environmental protection, and other infrastructure to provide long-term economic benefits; and stabilizing state and local government budgets. The Recovery Act delineates an important set of responsibilities for the U.S. General Accounting Office (GAO) and others in the accountability community. GAO's bimonthly reviews of selected states' and localities' uses of the Recovery Act funds will examine how funds are being used and achieving the stated purposes of the Recovery Act. GAO has selected a core group of 16 states to follow over the next few years to provide an ongoing longitudinal analysis of the use of funds under the Recovery Act. These states contain about 65 percent of the U.S. population and are estimated to receive about two-thirds of the intergovernmental grants funds available through the Recovery Act. The Commonwealth of Massachusetts has been selected as one of the core group states for GAO monitoring. DHCD, in cooperation with the Massachusetts Comptroller's Office is currently participating in weekly conference calls. Furthermore, all internal control systems at DHCD are being updated to accommodate CSBG Recovery Act reporting and tracking requirements as outlined in subsection E (1), (2), (3) and F below.

(1) State Program Monitoring

The Coats Human Services Reauthorization Act of 1998, Sections 676 and 678B, requires DHCD to perform a full onsite review of each CAA at least once during each 3-year period.

DHCD has a comprehensive and in-depth monitoring process in place. DHCD has made its monitoring, assessment, oversight, and technical assistance responsibilities high priority tasks within the Division of Community Services (DCS). Consequently, the Community Services Unit (CSU) and Financial and Compliance Unit (FCU) staffs within DCS employ a holistic approach to ensure adequate analysis and coordination of information is reviewed and discussed to support the assessment process. DHCD conducts an in-depth on-site monitoring review of each CAA at least once during each three-year period and in accordance with a planned calendar schedule. Agencies deemed “at risk” receive a more frequent in-depth monitoring assessment, which often includes increased site visits during a three-year period. Through mutual collaboration of organizations such as the Northeast Institute for Quality Community Action (NIQCA), and Massachusetts Association for Community Action (MASSCAP), DHCD is in close communication with agencies, in order to assure compliance and overall health of the organizations, as well as supporting them with technical assistance in implementing Recovery Act programs and organizational capacity building.

DHCD has been working with agencies since the Government Performance and Results Act (GPRA) passed in 1993 to facilitate CAAs, and to some extent, DHCD’s transition from service-based to outcome-based approaches using guidelines available mainly due to the implementation of Results-Oriented Management and Accountability Act in 1998 (ROMA).

DHCD utilizes a comprehensive in-depth monitoring and assessment tool in order to assure that the network of CAAs meet the highest standards of management and service excellence. The monitoring tool provides a comprehensive assessment protocol not only for its CSBG programs, but also for Community Action as a whole. During the assessment, each CAA’s organizational

and programmatic capacities are measured and best practice activities are highlighted in the following areas:

- Board Oversight;
- Executive Management;
- Fiscal Oversight and Internal Controls;
- Human Resource Development;
- Program Planning and Implementation, including ROMA;
- Management Information Systems; and
- Outreach.

The three-year Community Action Plan (CAP) and the annual work plan play a fundamental role in the monitoring process. In order to determine whether a CAA is meeting the goals of the CSBG Act, CSU associates the links between the goals that CAAs establish in their CAPs and in their annual work plan to what is corroborated later in various documents submitted to DHCD (grant applications, program progress reports, and IS Surveys).

DHCD conducts a review and analysis of CSBG-related information in-house throughout the year(s) between the CAP and the on-site in-depth monitoring visit. During the in-house review, DHCD examines work plans, board minutes, progress and financial reports, responses to requests for information, and any other relevant information indicative of the organizational and programmatic health of an agency.

Upon scheduling an on-site monitoring assessment with the CAA, the CSU program representative requests various compliance documents such as bylaws, articles of incorporation, personnel policies, etc. In addition to interviews with key management and program staff, and board members, the on-site monitoring includes a review of CAA administrative files as well as applicable program files. To the extent possible, the in-depth monitoring process combines on-site reviews for CSBG with LIHEAP. CSU utilizes a team approach in conducting in-depth reviews. The staffs from CSU and FCU perform in-house pre-assessment meetings, on-site monitoring visits, post-monitoring

debriefing meetings and exit conference meetings in concordance with the CSBG monitoring system. In addition, the CSU program representative is required to attend at least one (1) board of directors meeting annually, and generate board meeting monitoring reports that are sent to the community action agency and board chair as part of the on-going monitoring.

In an effort to further enhance monitoring standards, DHCD has increased collaboration efforts with NIQCA and the CAAs in order to meet the highest standards of management and service excellence. DHCD is developing a protocol to incorporate the NIQCA self-assessment as an essential element of an agency's scan of internal strengths and deficiencies. Data from the assessment would be used to develop three-year strategic goals related to applicable ROMA goals. Additionally, based on DHCD/CSBG monitoring, NIQCA self-assessments would be required for any CAA identified to be at risk. The integration of NIQCA self-assessment into DHCD monitoring practices allows for maximizing training and technical assistance resources to promote CAA management excellence and service productivity.

Fiscal Monitoring

The Financial and Compliance Unit (FCU) of the Division of Community Services (DCS) conducts the fiscal monitoring of CAAs on an annual basis. FCU has conducted an annual fiscal review of the CSBG, LIHEAP, WAP, and HEARTWAP programs operated by CAAs. The objective of the review is to ensure that all programs are operated in compliance with applicable State and Federal laws, regulations, contracts, and budgets and to offer training and technical assistance where necessary. In addition, the FCU requires each CAA to submit an agency-wide fiscal report and an annual agency audit. These documents are reviewed for significant findings.

Under the current threshold of \$30 million and risk-based criteria established for the state's single audit, the CSBG program is not considered a "major program". However, as part of the single audit, independent auditors review departmental internal control procedures. Internal control procedures are designed to cover

the controls existing for all divisions and programs of the department. Thus, the CSBG-established controls come under the purview of the independent auditor of the state's single audit.

In addition to the state's single audit, DHCD mandates that eligible entities of CSBG funds comply with OMB Circular A-133. Each eligible entity receiving CSBG funds submits a single agency-wide audit performed by an independent auditor in conformance with Circular A-133. These audits are reviewed, and where necessary, a Management Decision letter is issued by DHCD. The Financial and Compliance Unit follows through resolution on any audit findings reported in the single audit. Two separate audits shall be required, one for CSBG Recovery Act funds and one for non-Recovery Act funds.

DHCD shall monitor the use of CSBG Recovery Act funds for CAA administration purposes. CAAs are not allowed to budget more than 15% of their CSBG Recovery Act grants for administrative purposes. Furthermore, fiscal staff may perform an on-site monitoring visit to a sub-recipient agency, depending on the FCU risk assessment. These on-site visits are in addition to the in-depth fiscal and program assessment review required under the Coats Human Services Reauthorization Act of 1998, Public Law 105-285.

During Fiscal Year 2009 and Fiscal Year 2010, DHCD shall conduct an onsite assessment at each eligible entity listed in the following table to monitor the implementation of CSBG Recovery Act funded programs.

Table 5: In-depth Monitoring and Assessment Schedule

YEAR 1 (2008/2009)	YEAR 2 (2010)
January 2008 – CACCI	February 2010 – SSCAC
April 2008 – BCAC & NSCAP	March 2010 – VOC
September 2008 – LEO	April 2010 – CTI & SPCA
February 2009 – CAI	May 2010 – CAI
March 2009 – SMOC	June 2010 – ABCD
April 2009 – SPCA & WCAC	July 2010 – MOC

May 2009 – CAPIC	October 2010 – PACE*
June 2009 – GLCAC & SHI	November 2010 – CFC*
August 2009 – ACTION	December 2010 – TRI-CAP*
September 2009 – CAAS	* FY 2011.
November 2009 – QCAP	
December 2009 – CEOC	

2. Corrective Action Termination or Reduction of Funding [42 USC 9908(b)(8); 42 USC 9915]

The monitoring system strengthens the possibility for corrective action by increasing the opportunities to identify deficiencies in a CAA's programmatic and/or organizational areas. To the extent possible, DHCD utilizes a proactive approach in identifying and addressing programmatic and organizational deficiencies and provides assistance to agencies in implementing measures to avoid crises and stabilize operations where necessary. However, if it is determined that an agency has failed to deliver services and comply with requirements as provided in the Act, DHCD will follow procedures under Section 678 C of the Act.

DHCD has delineated its termination procedures in Section 29.05 "Corrective Action: Termination and Reduction of Funding" of 760 CMR 29.00 of the Department of Housing and Community Development's Community Services Block Grant Regulations. These procedures are set forth below:

- (1) If the Undersecretary of DHCD determines, on the basis of a final decision in a review pursuant to Section 678B of the Act and 760 CMR 29.09 that an eligible entity fails to comply with the terms of a DHCD funding agreement, or the Consolidated CSBG State Plan to provide services under the Act or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), DHCD shall:
 - a. inform the entity of the deficiency to be corrected;

- b. require the entity to correct the deficiency;
 - c. offer training and technical assistance, if appropriate, to help correct the deficiency, and prepare and submit to the Secretary of HHS a report describing the training and technical assistance offered; or if DHCD determines that such training and technical assistance are not appropriate, prepare and submit to the Secretary a report stating the reasons for the determination;
 - d. at the discretion of DHCD (taking into account the seriousness of the deficiency and the time required to correct the deficiency), allow the entity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan to correct such deficiency within a reasonable period of time, as determined by the Undersecretary of DHCD and not later than 30 days after receiving from an eligible entity a proposed quality improvement plan, either approve such proposed plan or specify the reasons why the proposed plan cannot be approved; and
 - e. after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding of the eligible entity unless the entity corrects the deficiency.
- (2) A determination to terminate the designation or reduce the funding of an eligible entity is reviewable by the Secretary in accordance with the Act.
- (3) The procedures set forth in 760 CMR 29.05 are intended to be carried out consistently with the protections and procedures

provided in the CSBG Act; as it may be amended, and any applicable federal regulations. In the case of a conflict, the federal requirements shall prevail.

- (4) A community action agency (CAA) or other eligible entity will not have its present or future funding terminated and DHCD will not de-designate a CAA or other eligible entity until procedures under Section 678C of the Act are followed and a review by the Secretary of HHS is completed pursuant to Section 678C(B) of the Act. Nor will an eligible entity have its funding reduced below the proportional share of funding it received the previous fiscal year, except in accordance with the requirements of the Act.

As part of the monitoring process, the CAA is provided a draft report for review and comment. CAAs are provided information on how they are meeting the CSBG assurances. The CAA is given a period of time to provide a written response to the monitoring report. Training shall be provided in combination with the onsite compliance monitoring. Monitoring of subgrantee agencies shall emphasize the identification of training needs as well as compliance with federal and state regulations. Training shall be provided both on-site during monitoring and in follow-up sessions. If further action is needed, DHCD shall form a Steering Committee comprised of DHCD, MASSCAP, and grantee representatives. The Steering Committee may convene regular meetings concerning the oversight and status of recommendation tasks.

DHCD believes this approach eliminates any interruption of services to communities, and avoids increasing any negative public perceptions.

(3) Tracking

The Commonwealth of Massachusetts has set up a separate Appropriation, program code and Revenue Source code in the Massachusetts Management Accounting and Reporting System (MMARS), state's main accounting system to

track all expenditures and drawdowns for the CSBG Recovery Act program.

DHCD shall institute additional programmatic and fiscal reporting process required by the Act. Notwithstanding any supplemental reporting requirements as outlined in the Recovery Act, the following reports shall be obtained from all eligible entities:

- “The total amount of CSBG Recovery Act funds received by the agency;
- The amount of recovery funds received that were expended or obligated to projects or activities; and
- a detailed list of all projects or activities for which recovery funds were expended or obligated; including—
 - the name of the project or activity;
 - a description of the project or activity;
 - an evaluation of the completion status of the project or activity; and
 - an estimate of the number of jobs created and the number of jobs retained by the project or activity.”

Additional accountability measures for CSBG Recovery Act funds shall be implemented as per guidance that may be issued from time to time by the U.S Department of Health and Human Services, Administration for Children and Families, Office of Community Services.

F. Reporting and Registration Requirements

In accordance with Section 1512 of the American Recovery and Reinvestment Act of 2009, Public Law 111–5, DHCD hereby agrees to the following reporting and registration requirements:

(a) Shall complete projects or activities, which are funded under the Recovery Act and report on use of Recovery Act funds provided through this award. Information from these reports shall be made available to the public.

(b) Shall provide reports no later than ten calendar days after each calendar

quarter on activities funded in whole or in part by the Recovery Act.

(c) DHCD shall maintain current registrations in the Central Contractor Registration (www.ccr.gov) at all times during which they have active federal awards funded with Recovery Act funds. (A Dun and Bradstreet Data Universal Numbering System (DUNS) Number (www.dnb.com) is one of the requirements for registration in the Central Contractor Registration).

(d) DHCD shall report the information described in section 1512(c) using the reporting instructions and data elements available online at www.FederalReporting.gov and shall ensure the accuracy of all pre-filled information by updating it on a regular basis, when applicable.